

CURT ANDERSON

[REDACTED]

MUR 3774

3/18/97

MAR 19 1 27 PM '97

RESPONSES TO INTERROGATORIES FROM THE FEC

1. Spring of 89 through January of 93.
2. Coalitions Director Spring of 89 through December of 90
Southern Field Representative January of 91 through January of 93
3. No
4. a. Tom Perdue (even though I was the southern regional rep, Georgia was not my state, and I never traveled there.)
b. Paul Wellday
c. Laurel Pressler in 1994, none that I recall in 1992
d. none that I recall
e. John Preyer, Lauch Faircloth
f. Joe Davis, Janet Thomas, Tommy Hartnett
g. none that I recall
5. Not that I recall
6. Yes. Rod Grams, Sam Dawson
7. Not that I recall
8. I have performed minimal consulting services starting in the Spring of 93. The nature of the work has been to help them raise funds.
9. I performed minimal consulting services for them, from the Spring of 93 through the end of 1993. The nature of the work was to provide strategic advice on issues they work on and help them raise money.
10. I was employed by Coalitions for America for all of 1987, and organized their meetings.
11. No
12. No
13. No
14. No

PRODUCTION OF DOCUMENTS

1. I have never kept calendars or diaries.
2. I have kept no files from 1992.
3. I have kept no files from 1992.
4. I have kept no files from 1993.
5. I have kept no files from 1994.

Center L. Anderson

3/19/97

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 3774

**CURT ANDERSON'S
RESPONSES TO THE FEDERAL ELECTION
COMMISSION'S SUBPOENA**

MAR 21 3 42 PM '97

Curt Anderson hereby submits the following objections and responses to the Federal Election Commission's ("FEC") Subpoena to Produce Documents and Order to Submit Written Answers ("the FEC Subpoena") as follows:

GENERAL OBJECTIONS

The following general objections apply to each request for the production of documents and for written answers (the "Questions") accompanying the FEC Subpoena:

1. I object to the Questions to the extent that they call for the disclosure of information and/or production of documents that are protected from discovery by the attorney-client privilege or work-product immunity or are otherwise privileged. To the extent that any privileged document is or may be produced in response to the Questions, the production of any such document is inadvertent and is not to be deemed a waiver of any privilege with respect to the produced document or any other document.
2. I object to the Questions to the extent they purport to impose obligations to supplement the disclosure of information and/or the production of documents beyond those imposed by the United States Code and the Federal Rules of Civil Procedure.

3. I undertake to disclose information and produce documents in response to the Questions only in the form, and to the extent, required by 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure. I object to each instruction, definition, question and request contained in the Questions to the extent that each instruction, definition, question and request attempts to impose obligations concerning the form or context of document production beyond those required by such provisions or exceeds the scope of investigation permitted by, or conflicts with 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure.

4. I object to the Questions to the extent that they call for the disclosure of information or the production of documents containing proprietary information.

5. I reserve the right to modify the objections made herein or to assert additional objections to production as appropriate.

6. I reserve the right to modify, amend or supplement the answers to the Questions contained herein as further information becomes available or as otherwise appropriate.

SPECIFIC OBJECTIONS, RESPONSES AND ANSWERS TO INTERROGATORIES

Subject to the General Objections, and without waiving same, I hereby respond to the individual Questions as follows:

Question No. 1

Provide all dates of your employment with the National Republican Senatorial Committee.

Response and Answer to Question No. 1:

I was employed at the National Republican Senatorial Committee from Spring of 1989 through January 1993.

Question No. 2

List all positions you held with the National Republican Senatorial Committee between 1988 and present, provide the dates during which you held each position and briefly describe your duties for each.

Response and Answer to Question No. 2:

I was Coalitions Director at the NRSC from when I started in Spring of 1989 through December 1990. I became Southern Field Representative and held that position from January 1991 through January 1993.

Question No. 3

State whether you ever provided consulting or other services to the National Republican Senatorial Committee for which you received compensation other than in your capacity as a paid employee. If so, state when and briefly describe the services provided.

Response and Answer to Question No. 3:

No. I never provided consulting or other services to the NRSC for which I received compensation other than in my capacity as a paid employee.

Question No. 4

Identify by name and position all contact persons connected with the following U.S. Senate campaigns with whom you communicated in 1992:

Response and Answer to Question No. 4:

(a) Paul Coverdell's Senate campaign, including the November 3 general election campaign and the November 24 runoff.

Tom Perdue, Campaign Manager. However, although I was the Southern Regional Representative, Georgia was not a state within my jurisdiction. I never traveled to Georgia and the only contact I had with the campaign was a very occasional phone call.

(b) Bob Kasten's Senate campaign.

Paul Wellday, Campaign Manager.

(c) Mike DeWine's Senate campaign.

No one that I can recall.

(d) Bob Packwood's Senate campaign.

No one that I can recall.

e. Lauch Faircloth's Senate campaign in 1992.

Lauch Faircloth, Candidate; John Preyer, Campaign Manager; Carter Wrenn, Outside Consultant.

f. Thomas Hartnett's Senate campaign in 1992.

Tommy Hartnett, Candidate; Joe Davis, Finance Director; Janet Thomas, Tommy Hartnett's Personal Assistant.

g. Dirk Kempthorne's Senate campaign in 1992.

No one that I can recall.

Question No. 5

State whether you communicated in 1993 with Kay Bailey Hutchison or anyone connected with her 1993 U.S. Senate campaign concerning federal elections. If so, identify any such person.

Response and Answer to Question No. 5:

I cannot recall any communications with Kay Bailey Hutchison or anyone else connected with her 1993 U.S. Senate campaign.

Question No. 6

State whether you communicated in 1994 with Rod Grams or anyone connected with his U.S. Senate campaign concerning federal elections. If so, identify any such person.

Response and Answer to Question No. 6:

Rod Grams, Candidate.

Question No. 7

State whether you communicated in 1994 with Rick Santorum or anyone connected with his 1994 U.S. Senate campaign concerning federal elections. If so, identify any such person.

Response and Answer to Question No. 7:

I cannot recall communicating with anyone concerning Rick Santorum's 1994 U.S. Senate campaign.

Question No. 8

State all dates on which you were ever employed by, contracted with, or received any form of compensation from the National Right to Life Committee. Briefly describe the work you performed for them during that time.

Response and Answer to Question No. 8:

I have performed consulting services at a rate of \$2,500 per month or less since the Spring of 1993. The nature of the work has been to provide occasional advice over the telephone concerning issues on which they work and to help them raise money.

Question No. 9

State all dates on which you were ever employed by, contracted with, or received any form of compensation from the American Defense Foundation and the American Defense Institute. Briefly describe the work you performed for them during that time.

Response and Answer to Question No. 9:

I performed minimal consulting services for American Defense Foundation from the Spring of 1993 through the end of 1993. The nature of the work was to provide strategic advice concerning the issues on which they work and to help them raise money. I performed no services for the American Defense Institute.

Question No. 10

State all dates on which you were ever employed by, contracted with or received any form of compensation from Coalitions for America. Briefly describe the work you performed for them during that time.

Response and Answer to Question No. 10:

I was employed by Coalitions for America for part of 1986 and all of 1987, during which time I organized their meetings and occasionally lobbied on issues.

Question No. 11

For the period between November 1992 and January 1, 1993, state whether you were employed by, or provided consulting or other services for which you received compensation to, Kay Bailey Hutchison, any of her authorized political committees (including Kay Bailey Hutchison for Senate), or any consultant or vendor working on their behalf. If so, state when and briefly describe the work you performed.

Response and Answer to Question No. 11:

I was never employed by nor did I ever provide consulting or other services for which I received compensation to Kay Bailey Hutchison, any of her authorized political committees or any consultant or vendor working on her behalf or on behalf of her campaign.

Question No. 12

For the period between January 1, 1992 and January 1, 1993, state whether you were employed by, or provided consulting or other services for which you received compensation to, Paul Coverdell, any of his authorized political committees (including Coverdell for Senate Committee), or any consultant or other vendor working on their behalf. If so, state when and briefly describe the work you performed.

Response and Answer to Question No. 12:

I was never employed by nor did I ever provide consulting or other services for which I received compensation to Paul Coverdell, any of his authorized political committees or any consultant or vendor working on his behalf or on behalf of his campaign.

Question No. 13

For the period between January 1, 1994 and January 1, 1995, state whether you were employed by, or provided consulting or other services for which you received compensation to, Rod Grams, any of his authorized political committees (including Rod Grams for U.S. Senate), or any consultant or other vendor working on their behalf. If so, state when and briefly describe the work you performed.

Response and Answer to Question No. 13:

I was never employed by nor did I ever provide consulting or other services for which I received compensation to Rod Grams, any of his authorized political committees or any consultant or vendor working on his behalf or on behalf of his campaign.

Question No. 14

For the period between January 1, 1994 and January 1, 1995, state whether you were employed by, or provided consulting or other services for which you received compensation to, Rick Santorum, any of his authorized political committees (including Santorum '94), or any consultant or other vendor working on their behalf. If so, state when and briefly describe the work you performed.

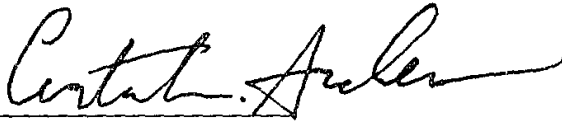
Response and Answer to Question No. 14:

I was never employed by nor did I ever provide consulting or other services for which I received compensation to Rick Santorum, any of his authorized political committees or any consultant or vendor working on his behalf or on behalf of his campaign.

**SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Subject to the General Objections stated above, and without waiving same, I hereby state that I have no documents responsive to any of the requests for production of documents (Nos. 1 through 5) within my possession, custody or control.

Respectfully submitted,


Curt Anderson

Dated: March 21, 1997

VERIFICATION OF WRITTEN ANSWERS

I, Curt Anderson, hereby declare under penalty of perjury that the foregoing Responses to the Federal Election Commission's Subpoena are true and correct to the best of my knowledge and belief.

March 20, 1997

By:



Curt Anderson

Subscribed and sworn before me this 20th day of March, 1997

Notary Public